

*State's edits to Cami's draft text is shown in track changes:*

EPA expects to work with potentially responsible parties to develop an implementation plan for completing cleanup at Portland Harbor and will likely manage the Portland Harbor cleanup by dividing the site into SMAs or groups of SMAs, or Operable Units for purposes of design and construction, based on prioritization of significant source and risk areas, logistics or sequencing of construction (including the potential for resuspension of contaminants during construction), efficiency or other factors. EPA may use a variety of administrative tools to expedite and complete remedy implementation, including entering into multiple consent decrees with different parties or groups of parties to expedite and complete remedy implementation. The implementation strategy will consider how to sequence cleanup and ~~will likely~~may require collection of additional data. Sequencing of cleanup will ~~need to~~ consider potential impacts of upstream work on downstream areas~~impacts of upstream contamination, proximity to other areas~~nature and extent of contamination ~~not being addressed~~ and integration of the how the cleanup action ~~fits~~ into the final-overall (final) remedy.

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